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ATTORNEYS FOR DEFENDANT, ADVANCED ENVIRONMENTAL TECHNOLOGY CORP. (TS-6491)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION, et al.,

Defendants.

Civil Action No. 02-CV-3830 (LDD)

**DEFENDANT AETC'S MOTION FOR  
AN ORDER GRANTING SUMMARY  
JUDGMENT, OR IN THE  
ALTERNATIVE, DISMISSING COUNT  
SIX OF ASHLAND'S CROSS-CLAIM  
FOR FAILURE TO PLEAD WITH  
PARTICULARITY**

TO: CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

Defendant Advanced Environmental Technology Corporation ("AETC") hereby applies to the United States District Court, Eastern District of Pennsylvania, 601 Market Street, Philadelphia, Pennsylvania, before United States District Court Judge Legrome D. Davis, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for an Order granting summary judgment dismissing Counts One through Ten of Ashland, Inc.'s ("Ashland") Cross-claim against AETC, or in the alternative, pursuant to Rule 9(b) of the Federal Rules of Civil

Procedure, dismissing Count Six of Ashland's Cross-claim against AETC for failure to plead fraud with particularity.

In support of the within motion, defendant AETC shall rely upon the accompanying Statement of Undisputed Material Facts, Memorandum of Law, Declaration of Laurie J. Sands and exhibits thereto. A proposed form of order is also submitted herewith.

Oral argument is requested.

WOLFF & SAMSON PC  
The Offices at Crystal Lake  
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Attorneys for Defendant, Advanced  
Environmental Technology Corp.

By: /s/ Laurie J. Sands  
LAURIE J. SANDS, ESQ.  
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Dated: February 22, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused by the Court's electronic notification system and by first class mail, postage prepaid, a true and correct copy of the foregoing Notice of Motion, Declaration of Laurie J. Sands, Statement of Undisputed Material Facts, Brief and proposed form of Order to be served upon all counsel of record.

/s/ Laurie J. Sands  
LAURIE J. SANDS, ESQ.

Dated: February 22, 2008